

Administrative Review Summary Report

Technical Assistance and Corrective Action Plan

Agency Code: #59-1130

School Food Authority: St. Elizabeth Ann Seton School

School(s) Reviewed: St. Elizabeth Ann Seton School

Review Date(s): 11/15-17/16

Date of Exit Conference: 11/17/16

State agencies (SA) are required to conduct Administrative Reviews (AR) to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrate corrective action was completed are specified.

Please submit corrective action via email, fax or mail prior to the negotiated due date.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the following staff at St. Elizabeth Ann Seton School; the Food Service Manager, School Principal, Bookkeeper, and the School Secretary for the courtesies extended to us during the on-site review. It was helpful to have all of the requested documentation pulled and ready for the review. We also appreciated the work done prior to the review in completing the Off-site Assessment Tool and submitting other requested documentation. This allowed us to spend more time during the onsite portion of the review providing technical assistance. We hope that you found the time spent in providing technical assistance helpful.

The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement and many other topics. More information can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>.

Dr. Tony Evers, State Superintendent of the Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit <http://dpi.wi.gov/statesupt/agenda-2017>.

Review Areas

1. Meal Access and Reimbursement

Comments/Technical Assistance/Compliance Reminders:

- Review of meal applications found that most were approved in a timely manner, and within the 10 *operating day* timeframe as required. It was noted that the approval date in some cases did not match the approval date recorded on the backside of the meal application. Please be sure these are consistent and match what is entered into your point of service system – Power School. For direct certifications (dc) the approval date is the dc run date.
- Recommendation was made to update the benefit issuance list:
 - Adding a number in front of each name and sorting the list by free and reduced will make it easier to determine the highest number approved for the reimbursement claim each month.
 - Add a column for reporting the grade.
 - Be sure to add a comment in the NOTES column when *extending meal benefits* due to dc, and please include a copy of the information from your student information system to document members in the household. Attach to the meal application of the student extending the meal benefits.
- At the beginning of the school year the benefit issuance (BI) list is created initially by listing all returning students (free and reduced only) and at any NEW enrollees known at the time. If the student does not recertify use the NOTES column when the carryover time period is over to note the status change to PAID. Throughout the school year the Notes column can also be used to document withdrawals or potential eligibility status changes.
- To clarify your answer to question #103 (carryover) on the Off-site Assessment Tool and also the date indicated in the Parent Letter attached to the f/r meal application: USDA requires up to a 30-day carryover of f/r meal eligibility for *returning students*, but no longer. However, when a new eligibility certification (either by dc or paper application approval) is made the carryover stops it does not continue thru the 30th operating day.
- Good job of protecting the anonymity of students eligible to receive free and reduced price meals in terms of access to the eligibility information. Additionally, there is no identifier on the lunch cards other than the student's name and ID number.
- Direct certification should be run a MINIMUM of three times per year: before start of school, 3 months (You will need to run direct cert in November this year to comply.) and 6 month timeframe.

Findings and Corrective Action Needed:

☒ **Finding #1:** The following were incorrectly approved meal applications (Errors were summarized on the *Eligibility Certification and Benefit Issuance Error Worksheet* left at the exit conference):

1. Applications A1, A2 and B1, B2 were missing a social security number (SSN). The box was also not checked to indicate the signer did not have a SSN.

Corrective Action Needed: Only application A1, A2 needs follow up since B1, B2 was found to be directly certified on 10/17/16 and the number is not applicable. For A1, A2 contact the household (hh) and obtain the number, or if the signer does not have a SSN, check the no SSN box. The Determining Official can take this information over the telephone and document directly on the application. Submit a copy of the application and COMPLETE the column – *Date of Correction* on the above mentioned Error Worksheet and submit as corrective action.

NOTE: All certification and benefit issuance, and verification (if part of the sample size) errors recorded on the worksheet are subject to fiscal action since this is considered a Critical review area. USDA has established a \$600 forgiveness before fiscal action is assessed. The review closure letter will advise the school if fiscal action is required.

Verification

Two applications were selected for verification (one of them was for cause). Both applications were incorrectly verified and will require additional follow up with the hh. The errors were recorded on the *Certification and Benefit Issuance Worksheet*.

☒ **Finding #1:** Documentation (pay stub) submitted to support income reported on application codes C1, C2 was not within the required timeframe, i.e. month prior to application, month of the application, or any month after that. In addition, the pay stub submitted shows that the pay is inconsistent due to mileage earned each month.

Corrective Action Needed: Based on the submitted pay information, the eligibility status of the household has already been changed to free, but will need obtain correct wage information to determine if the benefit change should have occurred. Follow up with the household to obtain income within the required timeframes. As needed get a month or more of pay to be able to determine if the benefits should remain as free or change back to reduced price meals. The household may submit annual income if from the prior year if that income is reflective of current income since the wage appears to be based on mileage and fluctuates monthly.

For corrective action, submit a copy of the documentation provided by the household, the letter (We Have Checked Your Application) sent to the household regarding your final review of the pay information, and a copy (take a screen shot) from your meal counting software to show the change in benefits if that is what occurs. COMPLETE the column – *Date of Correction* on the above mentioned Error Worksheet and submit to me. Be sure to update the benefit issuance list if a change in eligibility occurs. Use the Notes column to document the reason for any changes in status.

☒ **Finding #2:** Income documentation submitted for the application coded D1, D2, and D3 appears to show that the meal benefits should be changed to paid. There is a significant amount of overtime both for the timeframe reported and year to date, and the income earned year to date is over the income guidelines for even reduced price meals. Additionally, the income reported is significantly higher than the original eligibility determination made for free meals.

Corrective Action Needed: The household needs to provide some additional pay stubs for a one month period and then as needed the benefits changed to paid. If this occurs be sure to provide the household with the required 10 calendar day timeframe to appeal the change in status. During this timeframe, the students can continue to receive reduced price meals. Submit a copy of the documentation submitted by the household, your letter regarding your review of the income documentation and a screen shot from your meal counting software to show the change in benefits if that is what occurs. COMPLETE the column – *Date of Correction* on the above mentioned Error Worksheet and submit to me. Be sure to update the benefit issuance list if a change in eligibility occurs. Use the notes column to document changes in status.

RECOMMENDATION: When verification is completed next year, use the Tracker Form, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>, (second to last form), and keep copies of all communications sent to households selected for verification.

☒ **Finding #3:** Prior to completing verification the required *Confirmation Review* was not completed. Per the school's online contract, the School Principal is the designated Confirming Official.

Corrective Action Needed: The purpose of the confirmation is to ensure that a correct eligibility determination was made prior to sending out the We Must Check Your Application letter. The confirmation review requirements are fully discussed on page 85 of the USDA *Eligibility Manual for School Meals* (EM).

For corrective action, please review the confirmation review requirements in the EM and write your understanding of the requirements and intent to comply when verification is completed next school year.

☒ **Finding #4:** The Verification collection Report (VCR) was incorrectly completed. During the review the report was corrected for Section 3 and Section 4 based on the correct benefit issuance list.

Corrective Action Needed: Resubmit the corrected report for corrective action and notify DPI when that has been completed.

Based on the meal application and verification errors it is recommended that the Food Service Manager and/or any person that may in the future be the designated determining and verifying official attend the summer free/reduced/verification training. See introductory paragraph of this report regarding Skills Development Courses.

Meal Counting and Claiming

Comments/Technical Assistance/Compliance Reminders:

3K and 4K Program:

1. The school has a 3K and 4K program. The students are considered enrolled. The school also offers a *wrap-around care* program that is available to ALL students. Those that stay in the afternoon have access to the lunch meal and can be claimed for reimbursement. To date these students have NOT been claimed for reimbursement. Be sure to let ALL parents know that the school lunch program will be available to all students coming to *wrap-around care* and let them know that they may apply for free and reduced price meals at any time. For those households that already qualify for meal benefits but have not received the notification letter please be sure to inform them of their students eligibility for free or reduced price meals. Additionally, all enrolled students should be included on all future dc runs. You may begin claiming for these students with the November 2016 reimbursement claim.
2. Updates should be made to the benefit issuance list to include the 3K and 4K students and reflect any changes made due to the verification issues noted above. Please make sure the eligibility status in Power School matches the benefit issuance list.
- 3.

2. Meal Pattern and Nutritional Quality

Commendations and Appreciations

I would like to thank the Food Service Manager for the hospitality extended on the day of review. She and her staff were welcoming. I appreciate her openness to asking and answering questions. Open communication helped identify the strengths and areas of opportunity for the food service at St. Elizabeth Ann Seton Catholic School. Furthermore, I also applaud her

recognition of the areas for opportunity, willingness to learn, and determination to make improvements. Throughout the day, the Food Service Manager iterated the importance of developing tools, such as production records and standardized recipes, to help her and her staff succeed through school year 2016-2017 and beyond. I would also like to compliment the serving line setup. Even with a small amount of space, the serving line setup was attractive, efficient, and logical. Students visit the garden bar first, and as a result, fresh fruits and vegetables are popular choices.

Technical Assistance and Program Requirement Reminders

Preschool in the National School Lunch Program

Reimbursable meals served to 3K and 4K students can follow the Healthy, Hunger Free Kids Act (HHFKA) Meal Pattern for grades K-5. Resources from the School Nutrition Team may be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>.

One-Half Cup Fruit, Vegetable, or Combination Requirement

As a reminder, all reimbursable meals must include selection of 1/2 cup fruit, 1/2 cup vegetable, or 1/2 cup combination. One-half cup combination means the student selected 1/4 cup fruit, 1/4 cup vegetable, and two other full components.

Dietary Specifications (Salt)

Sodium is one of the four dietary specifications monitored under the HHFKA, with Target 2 scheduled for implementation in SY 2017-2018. The first target was implemented July 1, 2014. With this in mind, we encourage use of more low sodium and no salt added products, including canned beans, soups, and broths. Several other low sodium and no salt added products are already used in the operation, such as canned tomatoes and frozen vegetables, which is encouraging.

Signage

Acknowledging the cafeteria as a classroom where children learn to make healthy choices, adding signage to the garden bar will help them recognize appropriate portions. In addition, signage will help ensure students select the 1/2 cup fruit, vegetable, or combination required as part of a reimbursable meal.

Production Records

The Food Service Manager developed her own production record template using Excel. Technical assistance was provided onsite, reviewing the “must haves”, and hard copy of required and recommended information was provided. Missing information includes: planned portion sizes, including for condiments; menu item with recipe name/reference number or product name/description; total number of purchase units prepared; total number of portions prepared and number of portions leftover; and substitutions to original plans. Production records are intended to guide production and should be completed before, during, and after meal service. While there is no required production record template, there are some examples that may be used on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>. A hard copy of the SNT template was left onsite for consideration as well.

Whole Grains

All grains offered in school meal programs are required to be whole grain-rich. Grains that are not whole grain-rich cannot be credited toward the grain component. Both the dinner roll and the hamburger bun have “Whole Wheat” in their names. Unfortunately, a review of the ingredient list reveals neither of these products to be whole grain-rich. Whole grain-rich products list a whole

grain first in the product ingredient declaration, indicating whole grains are the primary ingredient by weight. A comprehensive whole grain resource created by the USDA can be found at <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>.

Standardized Recipes

Standardized recipes are required for all menu items that have more than one ingredient (e.g., turkey sub, hamburger on a bun). All standardized recipes must include detailed information about the specific ingredients, equipment, and procedures used to prepare the recipes. A standardized recipe is a recipe that has been tried, tested, evaluated, and adapted for use by a food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used, which is crucial for crediting school food service recipes. Recipes should be standardized in each production kitchen to reflect the products and practices that are used in that kitchen. This same process must be done to standardize USDA quantity recipes, especially when substitutions are made.

Instructions for standardizing recipes and recipe templates were left onsite and can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>. Verbal technical assistance was provided onsite. Hard copies of the Standardized Recipe Checklist and Recipe Crediting Checklist were provided as well.

Corrective Action

Meal Pattern Finding #1: Production records are missing multiple requirements.

Required Corrective Action: Submit production records for one day, updated to include the following requirements:

- Planned portion sizes, including for condiments
- Menu item with recipe name/reference number or product name/description
- Total number of purchase units prepared
- Total number of portions prepared and number of portions leftover
- Substitutions made to original plans

Meal Pattern Finding #2: Standardized recipes do not exist for several menu items for the week of review.

Required Corrective Action: Submit standardized recipes for the following menu items, including recipe yields (serving size for single portion(s), total number of portions, and total volume or measure [gallons or pieces]):

- **Priority item: Turkey n gravy**
- Baked beans
- Mac n cheese
- Mashed potatoes
- Hamburger stroganoff
- Asian chicken
- Chicken n cheese quesadillas

Meal Pattern Finding #3: Whole wheat dinner roll and hamburger bun are not whole-grain rich products. Grains that are not whole grain-rich cannot be credited toward the grain component.

I will contact the manufacturer for a Product Formulation Statement (PFS) or standardized recipe indicating the combined weight of multiple whole grain ingredients makes whole grains the primary ingredient by weight.

Required Corrective Action: If the manufacturer does not respond within 30 days, or if the PFS or standardized recipes reveal the products are not whole grain-rich, please discontinue serving these products and submit labels for replacement products.

3. Resource Management

Comments/Technical Assistance/Compliance Reminders:

SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources and best practices may be found on the SNT website <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section. The Food Service Manager does a good job to track monies to ensure that for each meal served there is money in the student's account. For the few times unpaid balances occur the principal has contacted the household and has been able to collect on the past due accounts. Good efforts!

Findings and Corrective Action Needed:

USDA has established four areas for compliance in the Resource Management area. A series of questions related to: Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, and Indirect Costs was sent to the SFA at least 4 weeks prior to the AR. Based on the answers the school triggered what is called a *Comprehensive Review*. For your school a comprehensive review was conducted in the Maintenance of the Nonprofit School Food Service Account and the Revenue from Nonprogram Foods areas. A series of follow up questions in both areas were sent to Laura and Mary Petrie to determine compliance.

Maintenance of the Nonprofit School Food Service Account:

Finding: The annual financial report (AFR) report had not been submitted at the time the review questions were sent. The bookkeeper submitted the report but the report showed a negative ending balance and I could not validate the line items submitted on the financial report based on the financial reports submitted.

Corrective Action Required: During the AR we spent time with the bookkeeper going through the detailed financial reports in an attempt to correct the report for the 2015-16 fiscal year. We arrived at figures to submit to correct the report. **Please email when Mary has submitted the updated report and it will be checked.**

The school has made the decision to move the maintenance of the school nutrition program finances to the school for the current school year. Time was spent working with school staff to review financial reporting for the program. I commend the school secretary for taking time to review the financial report webcast and encourage her to attend the more detailed summer training (School Nutrition Skills Development) about this report next summer. Time was spent during the AR to discuss the financial reporting requirements/changes for the 2016-17 SY. It was also suggested that you have an accountant review the food service program financial information for the 2015-16 SY to officially determine the ending balance in the food service account. The ending balance becomes the beginning balance reported on the 2016-17 AFR.

Revenue from Nonprogram Foods

Finding: The focus of this area is to ensure that revenues from the sale of food items that are not part of the reimbursable meal program cover the cost to purchase these items. Prior to the review the school indicated only milk and non-reimbursable (adult/visitor meals) were being sold. It was noted during the financial review that periodically the food service department purchases food or prepares meals for events or organizations outside lunch program. The costs of these foods/beverages is considered a nonprogram food. The revenues and expenditures have not been pulled out the lunch program and recorded into what was called the Ala Carte Program on the annual financial report (AFR).

Corrective Action Required: A separate account to record revenues and expenditures should be set up to record revenues and expenditure in what is now called the Nonprogram Food area of the AFR to allow for proper reporting of revenues and expenditures in this area.

The Food Service Manager will need to go back through her invoices to date to determine if any of these activities have occurred. Highlight on the invoice the cost of the foods/beverages purchased to allow the School Secretary to code to the proper account.

At the end of the school year a calculation also needs to be done to determine the revenues and expenditures from the sale of adult meals and extra milk that will also be recorded in the Nonprogram Foods area of the AFR.

The Food Service Manager will need to spend time using the recipe costing tool (Our Public Health Nutritionist discussed with her during the review.) to determine the average cost of the adult meal. That amount will be multiplied times the number of adult meals served and that cost will be reported in this area of the AR. The same number of meals will be multiplied by the adult meal charge - \$3.55 to determine the revenue for adult meals. The set-up of the new AFR will show an ending balance in each area, lunch program and nonprogram foods. If there is a loss in either program area the school will be required to transfer funds from another source to cover the loss for each respective program.

To ensure that revenues exceed expenditures for the catering events, adult meals, and extra milk sales someone at the school (collaboration between food service and school secretary) is required to complete the USDA Non Program Foods Revenue tool. This tool will determine if the proportion of nonprogram food revenue to total food service revenue is equal to or greater than the proportion of nonprogram food cost to total reimbursable meal food costs + nonprogram food costs. If the revenues are not, then a price increase should occur to ensure costs are being covered. Here is the link to the revenue tool, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>. DPI has develop a tool that links to the USDA tool. Schools can choose to use either of the tools. Here is the link to the USDA tool, http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls. Also here is the link to the DPI nutshell on nonprogram food revenue, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.

For corrective action, acknowledge your understanding of these new financial reporting requirements and intent to comply for the SY 2016-17.

Paid Lunch Equity (PLE)

Finding: The school has a *quarterly meal charge*. The website indicated the charge was \$110 in one place and \$125 in another part of the website. It was confirmed during the AR that in fact households were charged the lower quarterly lunch price. \$110 divided by 45 days (\$2.44) is less than the minimum average paid lunch price requirement per the Paid Lunch Equity tool (\$2.75).

Corrective Action Needed: Discussion of the lower price and how it relates to the completion of the PLE tool occurred during the AR, and after the review in a follow up telephone conversation. The principal sent an email on November 21 stating that the quarterly lunch price would be discontinued immediately. Only a couple of families took advantage of paying the quarterly amount and these families will be contacted to request additional funds to cover the price charged per day (\$2.90) effective for the second quarter (November 4). Thank you for providing a copy of the email sent to all parents regarding the increase in meal charges and discontinuation of the quarterly meal charge. This increase will put the school in compliance with the PLE minimum paid lunch price requirement.

NOTE: Time was spent with the School Secretary during the AR to show her how to *correctly* complete the PLE tool. The tool is required to be run annually and is used to determine if a price increase is required for the PAID lunch meal. An electronic copy of the corrected tool was sent to the school. When the 2017-18 SY PLE tool is completed next spring please do not hesitate to contact me for assistance.

I also requested that the Food Service Manager upload the corrected 2016-17 PLE tool to the current online contract and resubmit for approval. **Please email me when that has been completed and I check the contract for the corrected PLE tool.**

4. General Program Compliance

Civil Rights

Comments/Technical Assistance/Compliance Reminders:

During the review we discussed requirements for accommodating children with special dietary needs. It appears that in most cases the food service staff are very willing to meet student's dietary needs by bringing in the parent to discuss menu/meal accommodations that need to be made. This is just fine, but remember if there is no statement on file from the medical authority, then the student must be offered all meal pattern components and select at least three (this includes selection of at least ½ cup fruit or vegetable) per your offer versus serve policy.

DPI will be updating the *Dietary Request* form soon to meet modified requirements regarding accommodations for students with special dietary needs. Medical authorities no longer need to check a box to indicate if the child's medical condition is a "disability." The form will still require the medical authority to indicate the following: types of foods to be avoided, a list of foods to be substituted; and require a description of the modifications needed to accommodate the child's needs. If the form is completed by a medical authority the school will be required to meet the student's dietary needs/meal accommodations.

Findings and Corrective Action Needed:

Finding: The menu, lunch program information and the Parent Handbook found on the website does not have the correct non-discrimination statement.

Corrective Action Needed: For the menu because the format/document is too small to permit the full non-discrimination statement the material must include: **This institution is an equal opportunity provider.** Correct the menu for the December and submit a copy for corrective action.

The website and parent handbook should contain the full statement:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

Corrective action was completed officially on November 21. I received an email from the School Principal stating that the final corrections to the website had been made. Thanks also for updating the meal application materials in English and Spanish to the current school year.

Local School Wellness Policy

Comments/Technical Assistance/Compliance Reminders:

The school's wellness policy was reviewed. Good job to update the policy and document the update annually.

The local wellness policy requirement was established by the 2004 Child Nutrition Programs Reauthorization and further strengthened by the Healthy, Hunger-Free Kids Act of 2010. On July 29, 2016 regulations were finalized to create guidelines for written wellness policies established by School Food Authorities (SFAs). *The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.* A summary of the final rule was provided during the onsite review.

Content of the Wellness Policy

At a minimum the wellness policy must include:

Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs (Local Education Agency) are required to review and consider *evidence-based strategies* in determining these goals.

Evidence based strategies have been evaluated rigorously in studies and have been subject to critical peer review. Evidence based strategies are strategies so effective that they are supported by experts in the field – not just the people who developed and evaluated the program. At a minimum, School Food Authorities (SFAs) should review “Smarter Lunchroom” tools and strategies since these are evidence based, simple, low-cost or no-cost changes that have been shown to improve participation in the meal programs and at the same time encourage students to consume more whole grains, fruits, vegetables, and legumes, ultimately reducing platewaste. For more information on Smarter Lunchrooms, visit <http://dpi.wi.gov/team-nutrition/smarter-lunchrooms>.

- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the *Triennial Assessment* available to the public.

In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. You have done this already-good job!

Recommendations for update to your school WP include the following:

- Need goal(s) for **nutrition promotion**; e.g. school garden, encouraging purchase of local foods in lunch program, farm to school, culinary education.
- Change heading currently titled **Nutrition Guidelines** to: Standards and nutrition guidelines for all foods and beverages sold to students. You have language to address the school lunch program but should at least add language relevant to Smart Snacks – vending, fundraisers.
- Add a heading: Standards for all foods and beverages provided, but not sold to students during the school day to the paragraph that addresses class or student incentive programs.

Recommend expanding on this to include more specifics on guidelines for classroom parties and foods brought for snacks from home.

- Add policy language specific to food and beverage marketing and advertising for only those foods that are Smart Snacks compliant. This may not be applicable too much to your school since no Smart Snacks are sold and there does not appear to be food advertising anywhere in the school.
- Add language to describe public involvement in the development and updates, and evaluation of the WP. Keep copies of WP meetings/minutes, and document WP committee members.

Professional Standards (PS)

Professional Standards regulations established minimum hiring standards for school nutrition directors and annual training requirements for ALL staff. This regulation took effect July 1, 2015. Here is the link to the DPI summary of the regulation, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf>. A copy of the summary was given to the Food Service Manager during the onsite AR. NOTE: WI DPI has allowed SFAs flexibility to complete the annual training requirements over a 2 year period.

Findings and Corrective Action Needed:

-No documentation was on file to support continuing education for the Food Service Manager, or her assistant for the 2015-16 SY. Staff at the school that need to meet the PS requirements includes the Food Service Manager, Kitchen Assistant, and now the School Secretary. The Food Service Manager needs to meet continuing education hours for the **Director** category. Her assistant needs to meet continuing education hours for *Part Time Staff*, and the School Secretary falls into the *Other Staff* category.

Training is minute for minute and should be tracked. There are two tracking tools: DPI and USDA. Here is the link to the tools, <http://dpi.wi.gov/school-nutrition/professional-standards>, and scroll down to **Tracking Resources**.

For corrective action please review training completed for the 2015-16 SY for both food service program staff, and completed for the 2016-17 SY to date. Document completed training on one of the tracking tools and submit for corrective action. In addition to the tracking tool, develop a written plan to ensure the two year compliance can be met this year for each of the food service program staff. For the School Secretary, this school year will be year one for meeting her PS requirements.

For upcoming training opportunities please use the training webpage, <http://dpi.wi.gov/school-nutrition/training>. Remember: Viewing webcasts and webinars count toward the PS requirements

Food Safety, Storage and Buy American

Comments/Technical Assistance/Compliance Reminders:

The food safety area is monitored by the local health inspector twice per year. We recommend that you discuss the following comments with your inspector at the time of the next inspection.

Review of the food safety plan found the following omissions:

- Temperature logs for freezers (3), upright refrigerator (1), and milk cooler and dishmachine were inconsistent prior to November. Number each freezer and be sure all units are added to the production record. Temperatures should be documented daily.
- The food safety plan only contained blanks for thermometer calibration logs, the employee reporting agreement did not appear to be completed, and there was no completed food safety checklist for food safety system and plan.
- Food Safety Plan (fs plan) did not contain *date last updated*. I know it was not recent since the DPI template Standard Operating Procedures are formatted differently. Please compare your plan to the DPI fs plan and update SOPs as needed. Here is a link to the food safety plan, http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc. Complete check boxes on SOPs that have these boxes. Review your list of Process 3 foods. During the AR beef stroganoff was served and the beef was cooked the day before, thus making it a Process 3 menu item.

Other Food Safety Observations

- Leftover food was not stored in “food grade” containers. For example, ice cream pails were reused. Purchase appropriate food storage containers.
- Take more care to only reuse foods from the fruit/vegetable bar that are not TCS (Temperature Control for Food Safety). TCS foods includes (not all inclusive) leafy greens, cut tomatoes, and melons to name a few. After meal service any TCS foods should be discarded. Try to limit the amount put out between grade groups. This is also a food quality issue.
- When dishes are clean in the dish machine do not push the clean dishes in the rack thru the machine with the dirty rack. This limits the potential for contamination of the clean dishes and utensils.
- Change gloves more often when completing different tasks.
- Replenish foods by using a clean container or placing remaining product on top of the new product.
- With regard to milk coolers/barrels (*cow cooler* with frozen inserts), here is the latest DPI recommendation: Service of milk in coolers, or insulated bags without mechanical refrigeration is allowable when used as intended (frozen inserts and packs). Milk must be monitored to ensure the temperature is kept below 41 degrees Fahrenheit. If the milk is kept below 41 F, the milk can be kept and placed back in a cooling unit for future service. If at any time milk is above 41 F, all milk must be tossed. SFAs may consider taping a thermometer inside an insulated milk bag or using a Time Temperature Indicator (TTI). Using milk coolers and bags requires a Standard Operating Procedure be in place. See our food safety website for more information on proper use of milk barrels and bags. <http://dpi.wi.gov/school-nutrition/food-safety/>

Buy American

Comments/Technical Assistance/Compliance Reminders:

Regulations took effect with the start of the 2016-17 SY for the *Buy American provision*.

This provision requires SFAs to purchase, to the maximum extent practicable, *domestic commodity or product*.

“Domestic Commodity or Product” are defined as an agricultural commodity that is produced in the United States and a food product that is processed in the United States using substantial agricultural commodities that are produced in the United States.

“Substantial” means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically.

Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under this provision as territories of the United States.

The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs.

The AR requires the State Agency to assess compliance by checking 1-2 items in a variety of food categories. The following items were found to be non-compliant:

- Minced onion
- Garlic salt
- Mandarin oranges
- Tropical fruit

Recommendations for compliance:

-Add Buy American clause to vendor contracts/solicitation agreements. Monitor products when delivered to ensure they are domestic.

-Some products will not be grown domestically, such as pineapple and mandarin oranges. You will need to check with your vendors to see if these products are available domestically. If they are not, document on the Non-compliant Product List, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>. Other possible reasons for not purchasing domestically includes: cost, seasonality, availability, and substitution.

-If ordering online check with vendor to see if there is a link for determining the origin of the product.

Please ensure that you are compliant with the Buy American provision moving forward. Feel free to ask Randy Jones or Alex Zitske about this provision/requirement at the time of your upcoming procurement review.

Reporting and Recordkeeping

Findings and Corrective Action Needed: When asked if she knew what the record retention requirements were, the Food Service Manager did not know. She indicated that she thought she had two years of files available.

USDA requires food service records to be kept for 3 years plus the current year, or 3 years after the final claim for reimbursement for the fiscal year or until audit resolution of any audits.

For corrective action, please write your understanding of this requirement and develop a plan to ensure compliance. As needed the school should provide storage space for your files.

Summer Food Service Program Outreach (SFSP)

Comments/Technical Assistance/Compliance Reminders:

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at St. Elizabeth Ann Seton School USDA requires that all SFAs inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the summer meals locator on the DPI Summer Meals website
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
 - Promotion of the USDA Summer Food website
<http://www.fns.usda.gov/summerfoodrocks>.
 - For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD
Summer Food Service Program Coordinator
Phone: 608.266.7124
e-mail: amy.kolano@dpi.wi.gov

The Sheboygan School District is a SFSP sponsor, and the district has developed a nice brochure promoting their program. You might contact the District Food Service Director to see if she would be willing to share copies for distribution to your households. She can be reached by telephone at (920) 459 3531.

As discussed at the exit conference, it is understood that prompt corrective action is required for the findings identified above. 7 CFR 210.18 requires fiscal action to be calculated for critical violations to reclaim of unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Section 207 of the Healthy Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agencies to report the final results of the administrative review to the public in an accessible, easily understood manner in accordance with guidelines promulgated by the Secretary. The final rule at 7 CFR 210.18(m) requires the State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website, and the SFA is strongly encouraged to post a summary on the SFA's public website. A summary of this review will be made publicly available on the SNT website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the SFA receiving the final AR report.

_____ Signature of Authorized Representative	_____ Date of Exit	_____ Negotiated Corrective Action Date
_____ Signature of Food Service Director		
_____ Signature of Nutrition Program Consultant	_____ Signature of Public Health Nutritionist	

